

## **Summary of the Accrediting Authority Committee Meeting September 19, 1997**

The Accrediting Authority Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on Friday, September 19, 1997 from 12:00 to 2:00 pm Eastern time. The meeting was led by Committee Chair, Mr. John Anderson, Division Manager of the State of Illinois Environmental Protection Agency (IL-EPA). A list of action items is given in Attachment A. A list of Committee members is given in Attachment B. Committee members had been sent a copy of the agenda (Attachment C) and a copy of the Standard (revision 4.1) containing changes suggested by the Chair in preparation for this meeting.

### **Introduction**

Mr. Anderson reported that he had received several favorable comments on the work of the Committee in preparing for the sessions at the Third NELAC Annual Meeting last July. He noted that while the chapter was approved at the Conference, there were still issues to be addressed which are listed in the minutes of the July 29, 1997, meeting of this Committee and are reflected in the prepared agenda.

### **Action Items from Previous Meeting**

Mr. Anderson stated that he will draft a letter to the NELAC Board of Directors recommending that a means of retaining institutional memory, including archived minutes of all committees, be developed. As was pointed out by an audience member at the Committee's meeting on July 29, 1997, in Dallas, maintaining an institutional memory is important so that future stakeholders can gain a sense of the reasoning involved in the actions and Standards of the Conference. The Committee had directed Mr. Anderson to write such a letter at its previous meeting.

The issue of consistency with ISO guidelines is an agenda item for this meeting.

The definition of the term "NELAP recognition" has been removed from Chapter 6. Ms. Aurora Shields will contact Dr. Fred Haeberer to ensure its inclusion in the glossary.

The additional issues from the previous meeting are the basis for the agenda for this meeting.

Additional meetings by teleconference for this Committee are scheduled for September 26 and October 3.

Following additional discussion the agenda for this meeting was addressed.

### **Definition of Secondary Accrediting Authority**

Mr. Anderson noted that he and Ms. Long have carefully compared Chapters One and Six, and no conflict is apparent. The Committee concurred that no further clarification of primary and secondary accrediting authority definitions is necessary in Chapter 6.

### **Establishment of Advisory Committee(s)**

Discussion of this issue was resolved by

- i. noting that under section 6.2(g) either subpart 1 or subpart 2, the Committee's structure must be designed to assure impartiality; and
- ii. rewording subpart 2 to read "... to provide relevant competent technical support and impartiality ..."

The Committee noted that these requirements would apply to both primary and secondary accrediting authorities.

### **Consistency of 6.2.2(b) and 6.2.2(d)**

This discussion was deferred for later discussion and would be incorporated with agenda item 11 concerning the accreditation of laboratories in the same agency as the accrediting authority..

### **Response Time Definition**

A question was raised during the previous meeting regarding the 10-15 days allowed for the application review process, whether this meant calendar days or business days. Following discussion, it was agreed that, in the absence of qualifiers, it is clear that the number of days is the number of calendar days. Mr. Anderson noted that the Transition Ad Hoc Committee had considered this question and arrived at the same conclusion, and had determined that the number of days specified for review of application documents appeared reasonable at this time.

### **Total Response Time of an Accrediting Authority**

During the previous meeting the reason for specifying a nine month total response time (section 6.3.3.1(e)) was questioned. Following discussion, the Committee agreed that this appears to be a reasonable compromise between faster response time and limited resources, based on the experience of Committee members.

### **Number of Appeals per Application Cycle**

During the previous meeting it was noted that Figure 1 was inconsistent with the specification that an accrediting authority is allowed only one appeal per application cycle. This is now specified in 6.10(h), and was considered an editorial change.

### **Operation of Multiple Accreditation Programs**

The possibility was raised that as accrediting authorities, some States may want to operate a laboratory accreditation program outside the scope of the NELAC Standards. The Committee acknowledged that a State, Territorial or Federal agency has authority to operate any laboratory accrediting program or programs it desired. The Committee felt that while the NELAC Standards do not address such a possibility, it is hoped that no non-NELAC accreditation programs would be instituted. Concern was expressed that operating accreditation programs in addition to NELAC would hinder the goal of attaining accurate and reliable environmental laboratory data throughout the nation.

### **Definition of Application Acceptance by the NELAP Assessment Team**

The version of the chapter distributed to the Committee in preparation for this meeting contains the added phrase “for continued processing” in sections 6.3.3.2(a) - (c). The Committee agreed that this clarification should avoid potential misunderstanding.

### **Definition of “Lead Assessor”**

Section 6.9.1(e)(1)(A) specifies, as one option for qualifying an individual as an assessment team member, that registration as a lead assessor is acceptable. While this is not presently defined in the NELAC context, other accreditation systems define the qualifications of a lead assessor. Following discussion of available current definitions, Mr. Jack Farrell offered to FAX some examples to Mr. Anderson for discussion at the next meeting of this Committee. Mr. Anderson was directed to draft proposed language to clarify this question.

### **Multiple Accrediting Authorities in Same State**

Mr. Anderson noted that the issue of multiple accrediting authorities in a State is acknowledged in this chapter (section 6.2(b)). However, the issue of accreditation of multiple State laboratories within a State by the USEPA is not anticipated at this time due to resource constraints.

### **NELAP Recognition of State Laboratories**

In section 6.2.2(e), for departments or agencies that have institutional conflicts of interest, the wording has been changed in this revision from “may” to “shall”; the Committee agreed with this change.

### **Consistency with ISO Guides**

Based on discussion during the previous meeting, and at this meeting, a subcommittee will be appointed by Mr. Anderson to review the consistency of this chapter of the NELAC Standards with relevant ISO Guides. The subcommittee will consider the “measurability” of any ISO guidelines that are incorporated into Chapter 6, and will comply with the NELAC policy of not being redundant with other NELAC chapters.

### **Consider Comments by Department of Defense**

During the previous meeting, participants from the Department of Defense distributed a detailed set of concerns with the NELAC Standards, including this chapter. Mr. Anderson agreed then that this Committee would address those concerns in detail, which they now commenced. These concerns are included below, in *italics* (suggested insertions shown in double underscore, suggested deletions shown in ~~strikeout~~), with the Committee’s response following:

- 1     *The most recent version of this chapter has removed a provision for “interim” accreditation status for accrediting authorities.*  
Correct. No Committee action was taken on this comment because NELAP’s implementation plans incorporate provisions to address the DOD’s concerns.
- 2     *The chapter does not include all requirements of ISO Guide 58, which is a stated objective.*  
This will be addressed by the ISO subcommittee.

- 3     *The chapter should be edited to include complete reference citations.*  
The Committee agrees and will endeavor to do this.
- 4     Section 6.2(a): “In all cases ... state or ~~and~~ federal levels”  
This editorial change has been made.
- 5     Section 6.2: insert as (e) “The accrediting authority shall require accredited laboratories to maintain impartiality and integrity”.  
This will be addressed by the ISO subcommittee.
- 6     Section 6.2(f): in “... at least the phrase ~~word~~ “NELAP-recognized”  
This editorial change has been made.
- 7     Section 6.2(g): in “Accrediting Authorities are shall ~~encouraged~~...”  
This will be addressed by the ISO subcommittee.
- 8     Section 6.2(g)(2): “... a structure where Committee members are chosen to provide relevant technical competence impartially through ...”  
After discussion, the Committee changed the wording to: “... to provide relevant competent technical support and ...”
- 9     Section 6.2(g): add a final sentence 6.2(g)(3) “a mechanism for publishing interpretations and recommendations made by these committees.”  
This will be addressed by the ISO subcommittee.
- 10    Section 6.2.1(d): “or on-site assessment requirements for the fields of testing for which the laboratory holds primary NELAP accreditation”.  
This editorial change has been made.
- 11    Section 6.2.1(e): “... shall immediately notify, in writing, the applicable NELAP-recognized primary accrediting authority and the laboratory”.  
Following discussion, the Committee deferred action pending drafting of suitable wording by Mr. Anderson. Mr. Anderson was directed to propose revised wording by the Accrediting Authority’s next teleconference.
- 12    Section 6.2.2(b): “Except for governmental laboratories in federal departments and agencies ~~holding NELAP recognition as an accrediting authority,~~ “  
Following discussion, it was agreed that the Committee will place this on the agenda for the next teleconference.
- 13    Section 6.2.2(c): “... NELAP accreditation through any other state NELAP-recognized accrediting authority ...”  
Discussion of this comment was in progress when the teleconference cutoff occurred, and will be continued at the next teleconference.

**Remaining Issues**

Mr. Anderson noted that potential conflict-of-interest concerns regarding accreditation of State or Federal laboratories in the same department or agency as the accrediting authority was expressed during the Environmental Laboratory Advisory Board (ELAB) meeting last July. Copies of the ELAB meeting minutes setting forth these concerns will be distributed to Committee members for discussion at the next teleconference.

**Next Meeting**

The next teleconference is scheduled for September 26, 1997 at 12:00 pm, Eastern Daylight Time.

**ACTION ITEMS**  
**Accrediting Authority Committee Teleconference**  
**September 19, 1997**

<b>Item No.</b>	<b>Action</b>	<b>Date Completed</b>
1	Mr. Anderson will draft a letter to the NELAC Board of Directors regarding establishment of institutional memory for NELAC	
2	Ms. Shields will contact Fred Haeberer to ensure that "NELAP recognition" is included in the glossary	
3	Mr. Farrell will FAX example specifications of "lead assessor" to Mr. Anderson for discussion at the next meeting.	Sept. 22, 1997
4	Mr. Anderson will distribute ELAB concerns regarding potential conflict of interest to Committee members.	Sept. 22, 1997
5	Mr. Anderson will appoint a subcommittee to advise this Committee on the consistency of this chapter of the Standards with relevant ISO Guides.	Sept. 22, 1997
6	Mr. Anderson will draft wording related to <i>Section 6.2.1(e): "... shall immediately notify, in writing, the applicable NELAP-recognized primary accrediting authority <u>and the laboratory</u>".</i>	Sept. 22, 1997

**COMMITTEE MEMBERS & PARTICIPANTS**  
**Accrediting Authority Committee Teleconference**  
**September 19, 1997**

<b>Name</b>	<b>Affiliation</b>	<b>Phone/Fax/E-mail</b>
John Anderson, Chair with Jeri Long	Illinois EPA, Division of Laboratories	Tel: 217-782-6455 Fax: 217-524-0944 E-mail: jpanderson@epa.state.il.us
Roger Bucholz (absent)	Red Hawk Laboratory	Tel: 703-684-4468 Fax: 703-684-9946 E-mail: 500hawk@500hawk.com
Maude Bullock	Department of the Navy	Tel: 703-602-1738 Fax: 703-602-5547 E-mail: bullockm@n4.opnav.navy.mil
Bill Cusick	California Department of Food & Agriculture	Tel: 916-262-1434 Fax: 916-262-1572 E-mail: wcusick@smtp1.cdffa.ca.gov
Jack Farrell	Analytical Excellence, Inc.	Tel: 407-331-5040 Fax: 407-331-4025 E-mail: AEX@ix.netcom.com
Jeff Flowers	Flowers Chemical Laboratories	Tel: 407-339-5984 Fax: 407-260-6110 E-mail: jeff@flowerslabs.com
Carol Madding	US EPA	Tel: 513/569-7402 Fax: 513/569-7191 E-mail: madding.caroline@epamail.epa.gov
Jim Meyer (absent)	NC EHNR/DEM Chemistry Lab	Tel: 919-733-3906 Fax: 919-733-6241 E-mail:
Aurora Shields	Kansas Dept. of Health and Environment	Tel: 913-296-6196 Fax: 913-296-1641 E-mail: laportela@aol.com
Bob Wyeth (absent)	RECRA Environmental, Inc.	Tel: 716-691-2600 Fax: 716-691-2617 E-mail: labnet@recra.com
Gene Tatsch (support contractor)	Research Triangle Institute	Tel: 919-541-6930 Fax: 919-541-7386 E-mail: cet@rti.org

**AGENDA**

Accrediting Authority Committee Teleconference  
September 19, 1997

**Attachment C**

12:00 p.m.- 2:00 p.m. EDT  
Call-in Telephone Number 202/260-8330, Access Code 6532#

12:00	Opening Remarks by John Anderson
12:05	Approval of Agenda
12:06	Discussion of Action Items Contained in the Minutes of July 29, 1997, Committee Meeting
12:10	Begin Discussion of Items Listed in the Minutes of July 29, 1997, Committee Meeting under the Heading "Additional Issues For Subsequent Meetings":

Priority #		Issue
1	2.	Definition of secondary accrediting authority [Policy & Structure (1.6.2.3.2)]. It was noted that a conflict in definitions may exist between Chapters one and six.
2	3.	Establishment of advisory committees, to include the client community, for secondary accrediting authorities [6.2(g)]. Suggested wording is: "secondary accrediting authorities are encouraged to form an advisory committee for the purpose of receiving advice relating to the overall operations of its accreditation program which shall include representatives from its client laboratories."
3	5.	Ensure consistency of 6.2.2(d) with 6.2.2(b)
4	8.	Consider Chapter 6 sections that set forth response time requirements during the application review process allowing 10-15 days to respond; ?? calendar or work days? Is this too long, in practicality?
5	9.	In Section 6.3.3.1 - why was a nine-month total response time selected for inclusion in the regulations?
6	10.	In Fig 1: "Only 1 appeal per application cycle..." should be reconciled with text.
7	11.	Operation of dual programs? On this issue, this committee is mute, however it is on the agenda for Transition Committee meeting on July 30, 1997.
8	12.	May need to define "acceptance" of an application, which follows the "technical review" in Section 6.3.3.2(a).
9	13.	What does registration as a "lead assessor" mean? 6.9.1(e)(A). This should be an entry in the glossary.
10	14.	The issue of multiple accrediting authorities in the same state may need to be addressed. See Section 6.2.2(e).
11	6.	Change options to require state laboratories seeking NELAP recognition to go to the USEPA or other state NELAP-recognized accrediting authorities (like drinking water laboratories now) for accreditation [6.2.2(e)].
11	1.	Conflict of Interest concerns (ELAB) regarding accreditation of laboratories in the same Agency as the accrediting authority.
12	4.	Consistency with ISO Guide 58.
13	7.	Consider the entire DoD comment package.

1:45 p.m.	Review Progress. Make assignments for next teleconference.
2:00 p.m.	Automatic shut-off of teleconference.